



Michigan Society for Infection Prevention and Control

March 4, 2009

Representative Bert Johnson - Chair
Regulatory Reform Committee
Lansing, MI 48909

The Honorable Representative Bert Johnson:

I am writing on behalf of the Michigan Society for Infection Prevention and Control (MSIPC) concerning the proposed revision of the Michigan Medical Waste Act (MMWA).

MSIPC is a 35 year old organization averaging 400 members who work in acute care, long term care, home care, mental health, public health, correctional facilities, emergency response agencies, as well as health care product organizations and facilities to prevention and control healthcare-associated infection. MSIPC strives today to increase communication and access through the use of information technology, continually evaluating current education resources to serve member needs, and promoting science-based practices.

Our key focus on science-based practices is one reason we are writing to support the current revision of the Michigan Medical Waste Act, *HB 4459*. MSIPC supports the current revision of the MMWA Act, entitled as *HB4459*. MSIPC participated in the legislative process of developing the original MMWA from the beginning, supporting the existing rule and regulation, as well as the current proposed rule revision in *HB 4459*. We have assisted the Medical Waste Office, collaborating with the Association for Professionals in Infection Control and Epidemiology, Inc.-Greater Detroit, in providing education and health promotion to our members and communities related to minimizing exposure from regulated medical waste (RMW). We find the current proposed rule in *HB4459* maintains Michigan's requirements on a solid foundation of science as is evident in the care taken with the proposed MMWA definitions. MDEQ staff have fostered a dialogue with all stakeholders during this review process and clearly sought to ensure a thorough hearing of all views in order to reach consensus.

MSIPC supports only the current Bill *HB 4459* which reflects this consensus and clearly promotes minimization of risk related to disposal of all categories of RMW and home-generated waste. Although we see the definition of "trauma waste" as duplicative, we can only support the language that provides for a trauma management plan as stated in *HB 4459*.

MSIPC opposes and does not support *HB 4458* and cannot support the current tie-bar to *HB 4459* since *HB 4458* does not include many of the other definition revisions/provisions critical to the intent of the rule reached by all stakeholders over a long period of study and review of evidence. The additional language contained in *HB 4458* was considered and rejected by the Medical Waste Advisory Committee stakeholders group and the tie-bar between the two bills is unacceptable. The question of the need to regulate trauma scene cleanup companies is an entirely separate issue independent from the revisions to the Medical Waste Act and should not be tied in any way to the provisions of the Medical Waste Act other than clearly identifying Trauma Scene Cleanup operators as a regulated producer of medical waste.

Unfortunately we are unable to testify in today's public hearing, but MSIPC does consider this critical legislation. Please feel free to direct any questions to Ms. Judene Bartley, MS, MPH, CIC, Advocacy Chair at jbartley@ameritech.net or calling 248-646-4785.

Sincerely,

A handwritten signature in cursive script, reading "Rosemary Ham", is positioned below the word "Sincerely,".

Rosemary Ham RN, ARNP, CIC
President, Michigan Society for Infection Prevention and Control
www.msic-online.org